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May 1, 2024

Via ECF

Honorable John P. Mastando III
United States Bankruptcy Judge
U.S. Bankruptcy Court – SDNY
One Bowling Green
New York, New York 10004

Re: *In re JJ Arch LLC*
Case No. 24-10381 (JPM)
Adv. Proc. No. 24-01335 (JPM)

Dear Judge Mastando:

We are counsel to Jared Chassen. We have reviewed the agenda for tomorrow's hearing and status conference filed by the Debtor last evening and the amended agenda filed this morning, each filed without consultation with Mr. Chassen, AREH, or Oak. We are concerned with the proposed order of proceedings set forth in the amended agenda and respectfully request that the Court entertain the contested matters in the same order as referenced in this Court's April 17, 2024 *Order Denying Ex Parte Motion to Shorten*: i.e., a hearing on the remand motion, followed by a hearing on the lift stay motions, followed by a conference on the discovery and dismissal motions. We believe it is the most efficient way to proceed, as the remand motion and lift stay motions concern threshold matters.

We note that the Local Rules are silent as to the filing of an agenda except where provided by a case management order. *See* Local Bankr. Rule 9006-1(b). No such case management order has been entered.

Finally, to the extent a general status of the Debtor's case is discussed, we call the Court's attention to the Subchapter V Trustee Status Report dated April 24, 2024 [Dkt. No. 95], which we believe should be included as part of any discussion.

We have been informed that AREH and Oak concur with the foregoing.

Respectfully submitted,

/s/ Brendan M. Scott

Brendan M. Scott